



DISTRICT ATTORNEY
COUNTY OF NEW YORK
ONE HOGAN PLACE
New York, N.Y. 10013
(212) 335-9000

CYRUS R. VANCE, JR.
DISTRICT ATTORNEY

June 14, 2019

By Electronic and Certified Mail

The Honorable Jeffrey A. Rosen
Deputy Attorney General
United States Department of Justice
950 Pennsylvania Avenue NW
Washington, DC 20530

Dear Deputy Attorney General Rosen:

I am writing in response to your letter to me of June 11, 2019, in which you attach a May 17, 2019 letter from defense attorney Todd Blanche to Vicky Moser, the Warden of FCI Loretto, concerning Mr. Blanche's client, federal inmate Paul J. Manafort, Jr. (the "Blanche Letter"). The Blanche Letter recites the reasons why Mr. Manafort opposes my office's request for temporary custody of Mr. Manafort in New York County for the purpose of arraignment on a New York State grand jury indictment and further proceedings, a request that my office made pursuant to the Interstate Agreement on Detainers ("IAD") on May 7, 2019. Your letter asks whether my office wishes to respond to the Blanche Letter.

I understand that Mr. Blanche has now informed your office that, for unexplained reasons, Mr. Blanche never provided my office with a copy of the Blanche Letter to Warden Moser. Now that we have been provided a copy of the letter by your office, I have instructed the responsible prosecutors in my office to respond.

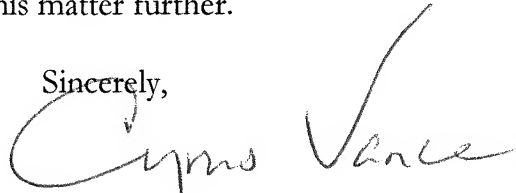
To this end, I attach a letter that has been sent today to Warden Moser from Christopher Conroy, Chief of our Major Economic Crimes Bureau, who is assigned to the prosecution of this case. As you will see, that letter makes clear that my office has never taken the position that Mr. Manafort should be housed at Rikers Island (as opposed to another state or federal facility in New York), or that he be placed in solitary confinement. Instead these are determinations to be made by the court and the relevant state and federal prison authorities, consistent with the provisions of the IAD.

As for Mr. Blanche's gratuitous claims about statutory double jeopardy violations, and his accusation that my office is engaging in "politics at its worst," such arguments have no place in a routine procedural analysis of when and how an inmate like Mr. Manafort

should be brought to New York to respond to charges pending against him: New York State crimes related to conduct for which he has not been held accountable by virtue of his federal prosecutions.

Thank you for bringing the Blanche Letter to my attention. Please let me know if you have any questions or would like to discuss this matter further.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cyrus Vance". The signature is written in dark ink and is positioned above the printed name.

Cyrus R. Vance, Jr.

cc: Todd Blanche, Esq.

Attachment

DISTRICT ATTORNEY

COUNTY OF NEW YORK

ONE HOGAN PLACE

New York, N. Y. 10013



CYRUS R. VANCE, JR.

DISTRICT ATTORNEY

June 14, 2019

By Electronic and Certified Mail

Ms. Vicky Moser
Warden
FCI Loretto
Federal Correctional Institution
P.O. Box 1000
Cresson, PA 16630

Dear Warden Moser:

I am writing on behalf of the Office of the New York County District Attorney, to respond to a letter to you dated May 17, 2019, from defense attorney Todd Blanche, concerning his client Paul J. Manafort, Jr., who is an inmate at FCI Loretto (the "Blanche Letter").¹ That letter set forth a number of reasons why Mr. Manafort opposes a request that our office made to you on May 7, 2019, seeking temporary custody of Mr. Manafort in New York County for the purposes of arraignment and subsequent proceedings in a New York State criminal case, pursuant to the Interstate Agreement on Detainers (the "IAD").²

The central assertion in the Blanche Letter is that our office, in connection with our May 7 application, is somehow "insisting that Mr. Manafort remain on Rikers Island, likely in solitary confinement, pending trial, despite the absence of any legitimate need for him to do so" (Blanche Letter at 3). Nothing could be further from the truth.³

¹ A copy of the Blanche Letter is attached for your reference.

² We are only now responding to the Blanche Letter because we received it for the first time three days ago, when it was attached to a letter from Deputy Attorney General Jeffrey A. Rosen to District Attorney Cyrus R. Vance, Jr. We learned shortly thereafter that the Blanche Letter was never provided to our office by Mr. Blanche.

³ A copy of our May 7, 2019 application to your office is attached. Given that the application was signed by New York State Supreme Court Justice Maxwell Wiley, who is the judge assigned to the case in New York, we are providing a copy of this letter to him.

To be clear, our request for temporary custody did not make any recommendation about where Mr. Manafort should be housed, or under what conditions, when he is transferred for the purpose of responding to the New York State charges against him. Our office takes no position on the question of where Mr. Manafort should be housed when he is in New York, whether it be on Rikers Island (as the Blanche Letter presumes), another city facility, or a local federal facility such as the Metropolitan Correctional Center (the "MCC"). In fact, as discussed below, whether or not to house Mr. Manafort at a local federal facility is a decision left to the sole discretion of the federal government. Nor do we take any position on the conditions under which Mr. Manafort should be held.⁴

Instead, our only concern is that Mr. Manafort be made available for arraignment and subsequent proceedings in a timely manner and, importantly, under circumstances that comport with the requirements of the IAD. In this regard, under the IAD, when presented with a temporary custody request of the sort we have submitted, the federal government has three options: it may 1) disapprove the request, 2) produce the inmate to state custody, or 3) transfer the inmate to a local federal facility instead of a state facility (here, for example, the MCC).

Any disapproval of a request by the federal authority must be made within thirty days of the state's transfer request. If that deadline is not met, the only remaining options for the federal authority are to produce the inmate to the state authority or to transfer the inmate to a local federal facility. In this case, the applicable deadline expired on June 7. As a result, there is no longer a legal basis for the federal government to deny our request outright, and we submit that the only remaining options under the IAD are to produce Mr. Manafort to New York State or to house him in a federal facility in New York City.⁵

Despite these provisions, the central request in the Blanche Letter is that Mr. Manafort remain housed at FCI Loretto and only be transferred as necessary from time to time to Manhattan during the pendency of the New York proceedings, rather than be housed in New York for the duration of the New York case. As noted above,

⁴ Notwithstanding the Blanche Letter's assumptions about "likely solitary confinement," we note that, as we understand it, an inmate will not be placed in "punitive segregation" (commonly referred to as solitary confinement) unless the inmate engages in certain prohibited conduct (New York City Department of Corrections Directive 4020R-A Section III(O)). Of course, Mr. Manafort's treatment in a local federal facility would be up to the Bureau of Prisons or the U.S. Marshals Service.

⁵ We cannot help but note the irony that, if our request were to be denied outright, it would create perhaps the greatest potential jeopardy to Mr. Manafort's personal interests, inasmuch as the net result would be to delay (without speedy trial concerns) his eventual state prosecution until after he has served his federal sentence. In such an event, if he were then to be convicted and sentenced in New York State, there would be no possibility of allowing his state sentence to be served concurrently with his federal sentence.

however, such an arrangement does not appear to be contemplated by the IAD, nor is it consistent with our experience in prosecuting similarly situated federal inmates for white-collar or other crimes.

By way of background, shortly after Mr. Manafort's indictment, Mr. Blanche asked that our office delay any attempt to seek custody of Mr. Manafort, given the impact his recent federal sentencing and state indictment had on his state of mind. In response, and notwithstanding an indication from the Marshals Service that it was willing to produce Mr. Manafort to us at the time, our office agreed to such a delay. Our agreement was in exchange for Mr. Manafort's agreement to waive, among other things, any right to challenge the method or process by which our office later sought to secure his attendance in New York.⁶ By submitting the Blanche Letter in opposition to our request for temporary custody, Mr. Manafort has violated the terms of the agreement.

In April, without the involvement of the federal government or Justice Wiley, the judge responsible for overseeing the case in New York, Mr. Blanche requested that our office consent to Mr. Manafort being allowed to travel between FCI Loretto and Manhattan, rather than be housed in New York. Then, as now, our position was that such an arrangement would be a departure from usual practice and, more importantly, inconsistent with the provisions of the IAD.

If the federal government decides that it likewise wants Mr. Manafort to travel between FCI Loretto and Manhattan during the pendency of the New York case, and if the federal government and counsel for Mr. Manafort are willing to provide the requisite binding assurances that such transfers will continue without interruption or delay, and Mr. Manafort waives appropriate protections of the IAD and New York law, our office would have no objection to such an arrangement, assuming the arrangement is also satisfactory to Justice Wiley.

Finally, with respect to the Blanche Letter's gratuitous claims about statutory double jeopardy violations, and the accusation that this office is engaging in "politics at its worst" (Blanche Letter at 4), we respectfully submit that such arguments have no place in the routine procedural analysis of when and how Mr. Manafort should be brought to New York to respond to the charges against him.

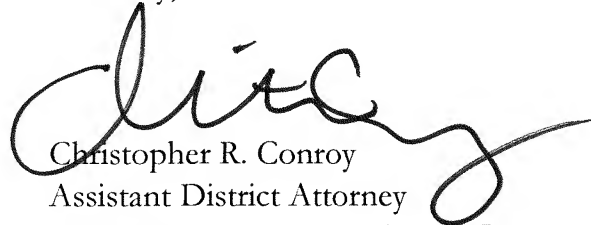
Mr. Manafort has been duly and properly indicted by a grand jury in New York County for a variety of serious financial crimes under New York law: crimes related to conduct for which he has not been held accountable by virtue of his federal

⁶ The agreement was reduced to writing on March 21, 2019, with Mr. Manafort and his counsel. A copy of that agreement is attached.

Warden Moser
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prosecutions. If Mr. Manafort believes he has valid statutory double jeopardy or other defenses to those state crimes, he will have a full opportunity to pursue such theories in the New York courts. Any postponement of such a reckoning through a procedural objection to a transfer of custody would delay, but not avoid, his ultimate state prosecution. Under the circumstances, our office believes that such a delay is unnecessary and inappropriate, under both state and federal law. We are highly confident that the grand jury charges that have been filed will be sustained, both substantively and procedurally, by a Manhattan jury and the New York State courts.

Sincerely,



Christopher R. Conroy
Assistant District Attorney
Chief, Major Economic Crimes Bureau

cc: The Honorable Maxwell Wiley (by hand)
Todd Blanche, Esq. (by electronic and certified mail)

Attachments

CADWALADER

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200 Liberty Street, New York, NY 10281
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May 17, 2019

VIA E-MAIL AND REGISTERED MAIL

Vicky Moser, Warden
FCI Loretto
P.O. Box 1000
Cresson, PA 16630

Re: Paul J. Manafort, Jr., Inmate No. 35207-016

Dear Warden Moser:

I write on behalf of my client, Paul J. Manafort, Jr., who is an inmate at FCI Loretto (Inmate No. 35207-016) serving a sentence of seven and a half years' imprisonment.

In connection with New York County Indictment 774/2019 against Mr. Manafort (the "Case"), the New York County District Attorney's Office (the "DA's Office") has made a Request for Temporary Custody of Mr. Manafort, dated May 3, 2019 (the "Request"), seeking custody of Mr. Manafort pursuant to Article IV(a) of the Interstate Agreement on Detainers ("IAD"), 18 U.S.C. App. 2, and proposing not to return him to federal custody until "after trial is completed" in New York.

Prior to the Request being submitted to you, I engaged with the DA's Office on behalf of Mr. Manafort in an effort to reach agreement regarding the terms of Mr. Manafort's temporary transfer to New York State custody to be arraigned in the Case. In particular, I proposed that the DA's Office secure Mr. Manafort's attendance in New York for the limited period of time necessary to appear and be arraigned, and that the DA's Office thereafter remit him to his designated federal facility—FCI Loretto—pending trial in the Case. As discussed in greater detail in my April 23, 2019 letter to the DA's Office on this subject, which I have enclosed herewith, we believe that allowing Mr. Manafort to remain at FCI Loretto pending trial in New York serves the interests of all interested parties, as well as the fair and efficient administration of justice, and can be accomplished without any risk of implicating Mr. Manafort's "anti-shuttling" rights under the IAD, which rights Mr. Manafort would be willing to waive in order to be returned to his designated federal facility following his arraignment. Unfortunately, and without explanation, the DA's Office informed us that it would not agree to this reasonable accommodation, instead issuing its Request seeking Mr. Manafort's presence in New York for the duration of the time between his arraignment and the end of his trial. Notwithstanding the District Attorney's decision, "[u]nder the provisions of Article IV(a) the Warden has up to 30 days to approve or disapprove the state's

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request for temporary custody,” during which time “the inmate may petition the Warden to disapprove the state’s request for temporary custody.”¹

We believe that there are several important considerations that warrant accommodating Mr. Manafort by allowing him to be temporarily transported to New York for his arraignment, but only on the condition that he be returned to his designated facility while he awaits trial. We request that you require the DA’s Office to re-issue the Request so that Mr. Manafort will be returned to FCI Loretto after his arraignment, and thereafter released into the custody of New York no earlier than one week before trial begins in the Case.

There are several reasons for this request. First, FCI Loretto is an appropriate facility in light of Mr. Manafort’s security needs, while Rikers Island—the New York facility where Mr. Manafort would most likely be housed—clearly is not. Mr. Manafort spent most of the past year in solitary confinement in Alexandria, Virginia in pre-trial detention. He was placed in solitary confinement because of the unusual notoriety of his case, not because Mr. Manafort posed any security risk to other inmates. For the same reasons, if he is forced to remain in New York pending trial in the Case, it is highly likely he will have to spend months or years before trial in solitary confinement. See NYDOC Directive 6007R-A (Protective Custody). Mr. Manafort is seventy years old, and in the past year endured two federal trials and two federal sentencing proceedings, in addition to the unusually high level of publicity surrounding his federal cases. Moreover, in light of the combined sentence of seven and a half years’ imprisonment imposed on Mr. Manafort in his federal cases, FCI Loretto is likely to be his home for the foreseeable future. Relocating him from this environment while he awaits trial in the Case would not further rehabilitation or any other purpose of his custodial sentence, nor would it advance the purpose of the IAD to address “uncertainties which obstruct programs of prisoner treatment and rehabilitation.” IAD Art. I.

Relatedly, we note that Mr. Manafort, who has been in custody for approximately one year, has suffered health challenges, and while his treatment is being managed, those challenges would best be addressed at his designated federal facility. These considerations are particularly weighty here in light of the fact that, as New York itself has acknowledged, the Rikers Island facility where

¹ U.S. Dep’t of Justice, Federal Bureau of Prisons, *Correctional Systems Manual* (P5800.15, updated 9/23/16), Ch. 6, P. 9. See IAD Art. IV(a) (“there shall be a period of thirty days after receipt by the appropriate authorities before the request be honored, within which period the Governor of the sending State may disapprove the request for temporary custody or availability, either upon his own motion or upon motion of the prisoner”); 18 U.S.C. App. 2 § 3 (“The term ‘Governor’ as used in the agreement on detainees shall mean with respect to the United States, the Attorney General”); see also 28 C.F.R. § 0.96(m) (delegation of authority to Director of Bureau of Prisons); *id.* § 0.97 (authorizing Director of Bureau of Prisons to re-delegate authority).

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Mr. Manafort would most likely be housed in New York remains burdened by “conditions that are unsecure, unsanitary and dangerous” and indeed “violating essential constitutional protections and State laws,” prompting New York officials to plan for the facility’s permanent closure.² Even if Mr. Manafort were housed at a facility other than Rikers Island, it would not serve anyone’s interests for him to be kept in a pre-trial detention facility in the New York City area while awaiting trial in the Case.

Second, Mr. Manafort’s request to return to FCI Loretto and remain there pending trial is supported by his strong interest in maintaining reasonable access to counsel in several criminal and civil matters, as well as his interest in visiting with family members, both of which would be impeded by his relocation to New York until the conclusion of trial in the Case. In particular, Mr. Manafort was recently a defendant in criminal proceedings before both the U.S. District Court for the District of Columbia, *United States v. Manafort*, 1:17-cr-00201-ABJ, and the U.S. District Court for the Eastern District of Virginia, *United States v. Manafort*, 1:18-cr-00083-TSE. While he has been sentenced in both federal cases, he is an interested party in forfeiture proceedings related to his federal criminal cases, also pending in the U.S. District Court for the District of Columbia, *In re: Petitions for Relief Concerning Consent Order of Forfeiture*, 1:18-mc-00167-ABJ, and continues to consult regularly with his Washington, DC-based counsel in those matters. Mr. Manafort also has an on-going civil case in Alexandria, Virginia, involving one of his properties, and must regularly consult with counsel regarding that matter. The same geographical considerations also apply to Mr. Manafort’s family members, who can more readily visit him at FCI Loretto than in New York, given where they live.

Both FCI Loretto and the New York courts are equipped with appropriate video-conferencing capabilities, and under New York’s procedural rules Mr. Manafort would be eligible to appear as necessary at court conferences or hearings between his arraignment and trial via this method. Thus, there is neither any need for Mr. Manafort to remain in New York pending trial, nor any need for him to repeatedly return to New York between his arraignment and trial, a period that will likely include considerable motion practice and other proceedings that will not require his physical attendance. While we do not know yet the trial schedule for the Case, discovery and motion practice, as well as usual delays that exist in the New York City court system, will very likely result in a trial not beginning for a year or longer.

² New York State Commission of Correction, *The Worst Offenders, Report: The Most Problematic Local Correctional Facilities of New York State* at 3 (February 2018) (noting “the need for closure of all jail facilities located on Rikers Island”).

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May 17, 2019

Finally, Mr. Manafort is being prosecuted in New York for exactly the same conduct for which he has already been tried and sentenced in the Eastern District of Virginia. Although this appears to be a blatant violation of New York's long-standing and highly protective statutory "Double Jeopardy" laws³—which expressly prohibit the District Attorney from re-trying Mr. Manafort for New York State offenses premised on the same alleged "act or criminal transaction" addressed in the prior federal case against him—the DA's Office has chosen to move forward with this prosecution, and is now attempting to add insult to injury by insisting that Mr. Manafort remain on Rikers Island, likely in solitary confinement, pending trial, despite the absence of any legitimate need for him to do so. This is politics at its worst, and while we expect that Mr. Manafort's rights ultimately will be vindicated in the Case, he should not be further punished in the interim through pre-trial detention on Rikers Island. Indeed, it is worth noting that if it were not for the federal sentence that Mr. Manafort is serving, he would almost certainly be granted bail for the charges he faces in New York.

In short, remaining at FCI Loretto will allow Mr. Manafort to be in general population where he can more effectively prepare for trial in the Case, as opposed to solitary confinement, receive appropriate medical treatment, meet regularly with counsel in the Case and other matters, and still achieve the District Attorney's objectives of progressing the Case towards trial and securing Mr. Manafort's appearance at trial when the time comes.

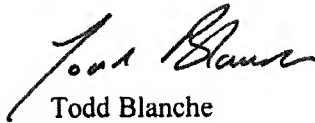
³ N.Y. Criminal Procedure Law § 40.20(2); see *People v. Abbamonte*, 43 N.Y.2d 74, 81–82 (1977) ("Under CPL 40.20, not only is the 'dual sovereignties' doctrine ignored, but double jeopardy protection is extended, generally, to offenses arising out of a common event.").

CADWALADER

May 17, 2019

I am available to discuss these matters at your earliest convenience. If you are inclined to grant the Request from the DA's Office as written, I respectfully request that I be given the opportunity to appeal your decision to others at the Bureau of Prisons and the Department of Justice.

Sincerely,



Todd Blanche

Enclosure

cc: Peirce R. Moser
Sean C. Pippen
James H. Graham
Lisa M. White
Assistant District Attorneys.

INTERSTATE AGREEMENT ON DETAINERS: FORM V

Six copies. Signed copies must be sent to the inmate and to the official who has the inmate in custody. A copy should be sent to the Agreement Administrators of both the sending and the receiving states. Copies should be retained by the person filing the request and the judge who signs the request. Prior to transfer, the inmate may be afforded a judicial hearing similar to that provided under the Uniform Criminal Extradition Act, in which the inmate may bring a limited challenge to this request

REQUEST FOR TEMPORARY CUSTODY

TO: V. Moser FCI Loretto

P.O. Box 1000, Cresson, PA 16630

Please be advised that Paul J. Manafort, Jr., Inmate #: 35207-016, who is presently an inmate of your institution, is under indictment in the County of New York, of which I am the Assistant District Attorney in New York County, New York State.

Said inmate is therein charged with the following offense(s):

OFFENSE

Residential Mortgage Fraud in the First Degree, N.Y. Penal Law § 187.25
Attempt to Commit Residential Mortgage Fraud in the First Degree, N.Y. Penal Law §§ 110.00/187.25
Scheme to Defraud in the First Degree, N.Y. Penal Law § 190.65(1)(b)
Falsifying Business Records in the First Degree, N.Y. Penal Law § 175.10
Conspiracy in the Fourth Degree, N.Y. Penal Law § 105.10(1)

In order that proceedings in this matter may be properly had, I hereby request temporary custody of such person pursuant to Article IV (a) of the Interstate Agreement on Detainers (IAD).

I propose to bring this person to trial on the above indictment within the time specified in Article IV (c) of the IAD.

Attached herewith find a certified copy of:

- A. The indictment.
- B. The warrant.
- C. Fingerprint cards, photographs and physical description (if available).

I hereby agree that immediately after trial is completed in this jurisdiction, I will return the prisoner directly to you or allow any jurisdiction you have designed to take temporary custody. I agree also to complete Form IX, the Notice of Disposition of a Detainer, immediately after trial and return it to your state with the inmate.

Signature: Sean Pippen

Dated: May 3, 2019

Sean Pippen
Assistant District Attorney
1 Hogan Place, New York, NY 10013

Telephone : (212) 335-9943

I hereby certify that the person whose signature appears above is an appropriate officer within the meaning of Article IV(a) and that the facts recited in this request for temporary custody are correct and that having duly recorded said request I hereby transmit it for action in accordance with its terms and the provisions of the IAD.

Signature: Maxwell Wiley

Dated: PT. 42 MAY 03 2019

Judge

Maxwell Wiley **HON. MAXWELL WILEY**, Judge

(Printed Name)

Supreme Court of the State of New York
New York, NY

Telephone: (646) 386-4042

DISTRICT ATTORNEY

COUNTY OF NEW YORK

ONE HOGAN PLACE

New York, N. Y. 10013



CYRUS R. VANCE, JR.

DISTRICT ATTORNEY

March 21, 2019

Todd Blanche, Esq.
Cadwalader, Wickersham & Taft LLP
200 Liberty Street
New York, NY 10281

Re: *People v. Manafort*, Ind. 774/2019

Dear Mr. Blanche:

Your client, Paul J. Manafort, Jr., has been charged by New York County Indictment 774/2019 (the "Case"). Mr. Manafort, who is currently in federal custody in Virginia, has not yet been arraigned in the Case. You have requested that the People refrain from taking immediate steps to secure Mr. Manafort's attendance in New York for arraignment. This letter memorializes the agreement between the parties regarding your request and will become effective upon execution by all parties and filing of the original letter agreement with the Court by the People.

The People agree (the "People's Agreement") not to file or serve formal process to secure Mr. Manafort's attendance in court in New York County until the earliest of:

- a. The date Mr. Manafort arrives at the federal penitentiary at which he is designated to serve his federal sentences;
- b. Forty-five days from the date of this letter agreement written above; or
- c. Such time that Mr. Manafort's release from federal custody is imminent.

The People's Agreement does not in any way limit the People's ability to prepare formal process by, for example, securing appropriate paperwork or conferring with relevant agencies. The People's Agreement likewise does not limit the People's ability to secure the right to obtain custody of Mr. Manafort at the appropriate time by, for example, lodging a detainer.

By this letter agreement, Mr. Manafort waives the benefit of any statutory or constitutional provision, to the extent the benefit of such constitutional provision is waivable, that limits the time available to the People to answer ready for or begin trial (the "Speedy Trial Waiver") from the date of this letter agreement written above until the earlier of:

- a. Thirty days after Mr. Manafort arrives at the federal penitentiary at which he is designated to serve his federal sentences; or
- b. The date on which he is arraigned in the Case.

The provisions to which the Speedy Trial Waiver applies include to the extent applicable, but are not limited to, Criminal Procedure Law Articles 30 and 580.

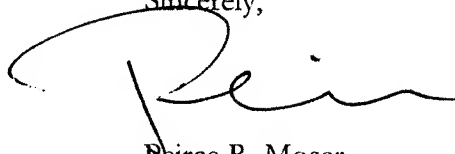
By this letter agreement, Mr. Manafort further waives any statutory or constitutional right he may possess, to the extent such constitutional right is waivable, to challenge the method or process by which the People secure his attendance in court in New York County (the "Process Waiver"). The Process Waiver includes, without limitation, any right Mr. Manafort may have to argue that the People have failed to comply with any relevant requirements of Criminal Procedure Law Articles 570 and 580.

The determination of what date to file or serve formal process to secure Mr. Manafort's attendance in court in New York County shall be in the People's sole discretion, and the People are not bound to file or serve such process on the earliest date that is consistent with the People's Agreement. As long as the People do not begin such process earlier than the earliest date that is consistent with the People's Agreement, Mr. Manafort shall be bound by the Speedy Trial Waiver and the Process Waiver.

Todd Blanche, Esq.
March 21, 2019
Page 3

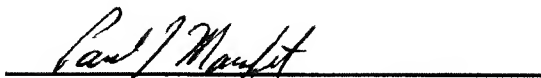
This letter agreement constitutes the entire agreement between the parties on this matter.

Sincerely,

A large, stylized handwritten signature in black ink, appearing to read "Peirce".

Peirce R. Moser
Sean C. Pippen
James H. Graham
Lisa M. White
Assistant District Attorneys

By signing below, we each acknowledge
that we have consulted sufficiently
regarding the above letter agreement and
agree to its terms:

A handwritten signature in black ink, appearing to read "Paul J. Manafort".

Paul J. Manafort, Jr., DefendantA handwritten signature in black ink, appearing to read "Todd Blanche".

Todd Blanche, Counsel for Mr. Manafort